

Mr. Clifford Hawkes
National Park Service
Denver Service Center
12795 West Alameda Parkway
Lakewood, CO 80228

Nov. 29, 1999

Dear Mr. Hawkes:

Attached are my comments concerning the Winter Use Plan for Yellowstone and Grand Teton National Parks. I oppose the preferred alternative that will plow the road from West Yellowstone to Old Faithful. I suspect most people believe, as I do, that winter activities are an integral part of the visitor experience in Yellowstone N.P. and that we should be able to choose the type of vehicle access that best meets our individual needs, whether that be as a family or an individual.

I support reasonable regulation of snowmobiles for emissions and noise. In this regard I favor the EPA's process in this effort. The NPS, whose expertise is not motorized emissions, should follow EPA guidelines when they are developed. It is obvious from the release of a flawed study on snowmobile emissions by Yellowstone N.P. officials that they are biased against snowmobiles and are incapable of making a fair, objective decision.

I also support keeping the entire Grand Loop open for snowmobile use. This is a one-of-its-kind experience for snowmobilers which offers a continuous outing without back tracking.

I especially oppose busing from West Yellowstone to Old Faithful. I would not enjoy such a ride and would not use it. Busing also does not take into account the economies of surrounding communities. The NPS helped create a healthy, viable snowmobile industry in West Yellowstone and cannot arbitrarily eliminate that use now.

Instead of your preferred Alternative B I support a modification of Alternative E that, in addition to adaptive planning, keeps the Grand Loop open to snowmobiling, with access from all current entrances; provides reasonable regulations for snowmobile emissions and noise; does not plow the road from West Yellowstone to Old Faithful; and provides the groomed

snowmobile routes currently available in GTNP.

SPECIFIC COMMENTS

1. Existing Condition, Pg. 4. I believe there is a major issue missing here. That is: support for local communities. Public land, including national parks, play an important role in maintaining and supporting local communities, both economically and socially. Congress spends considerable time through oversight hearings emphasizing this point. Economic impact has been a major point of contention from both West Yellowstone and Cody, as well as the adjacent counties of Fremont Co. ID., Gallatin and Park Counties MT, and Park and Teton Counties WY, and the States of Idaho, Montana and Wyoming. Yet economics is not a major issue in the document. This is an obvious error in the document.

Page 7 states "Community expectations for winter visitor use in and around the parks represent a part of the context for these issues and concerns." But community support is much more than "context." It is as much a part of the fabric of this area as visitor use or resource protection.

The top of page 14 defines an issue as "a point of contention about the specific possible environmental effect of a specific management action or program." There is a definite point of contention between the towns, counties and states in and around YNP and the proposed actions in this document.

Therefore, support for local communities should be added as an issue so its importance can be assessed along with other important issues.

2. Social and Economic Issues, Pg. 15. This is further evidence that support for local communities should be a major issue to be addressed in the existing condition.

3. NEPA, Pg. 17. The agency must, as it states in the document, develop alternatives that address the purpose and need for action. While the responsible official has discretion to limit the scope of analysis, he must

be careful not to do so in an arbitrary and capricious manner. As I understand it this means the agency may not ignore important information that is pertinent to the decision simply because that information is not consistent with the selected choice.

4. Formulation of Alternatives, Pg. 21. According to the text here, alternatives were developed in response to the major issues and concerns raised through **public** and internal scoping. However, in looking through the alternatives I see none that address the issue of support for local communities. If support for local communities is a major issue, as I believe it is, there should be an alternative that best supports the local communities surrounding YNP. There is none!

5. Effects of Alternatives, beginning on Pg. 157. Alt. B estimates the total economic output in the 17-county GYA area will be **reduced** by \$12.4 million, with an additional loss of 301 jobs related to reduced nonresident expenditures (pg. 198).

In addition there will be a loss of \$14.7 million in regional expenditures and 357 jobs in the 3-state area as a result of this proposal.

Further, the freedom to choose the type of transportation to use will be eliminated between West Yellowstone and Old Faithful, as will the opportunity to ride the Grand Loop be foregone. Instead, people will be forced to ride the bus to get to Old Faithful.

Alternative B will also result in more elk, bison and deer colliding with wheeled vehicles on plowed roads, resulting in more animals being killed.

So what benefits will accrue to the American public to offset these obvious negative effects? From reading the document we learn water and air pollution will decrease and noise levels will decline.

However, noise is not critical to those riding on snowmobiles, snowcoaches or buses since they are riding on/in a noisy vehicle anyway. Noise is critical to nonmotorized users like cross-country skiers and snow shoe

hikers. At a fairly moderate pace of 2 mi./hour these people can be in a negligible noise range in 20 minutes (assuming a 5 snowmobile group in a middleground setting) and consequently in a naturally quiet area. Here they can stay all day enjoying the quiet, returning only at night fall.

Less than 1% of the winter recreational visitors entering through West Yellowstone are cross-country skiers however (Pg. 217). And they can be out of range of motorized sound in roughly 20 minutes. In the case of noise, therefore, the benefit to the many (snowmobilers) outweighs the benefits to the few (skiers).

As for air pollution, air quality standards are occasionally exceeded on **high** snowmobile days at the West Entrance and Old Faithful corridor in YNP and at Flagg Ranch in GTNP (Pg. 94). For the most part air quality is good and there is no evidence of people getting sick from air pollution, other than an occasional employee at West entrance. Presumably this situation could be mitigated by limiting exposure and by moving the check point out from under the enclosed entrance at West where fumes can be trapped.

Water pollution may occur from snowmobile use. Samples found high levels of ammonia and sulfate in the snowpack along groomed roads (Pg. 180). However, there is no scientific evidence that these pollutants make their way into streams, or even if they do, the pollutants have an effect on fish or wildlife. The effect of 2-stroke engine emission deposits along groomed park roads is, in fact, unknown (Pg. 180).

In summary, preferred Alt. B will result in the loss of millions of dollars to local communities and the tri-state area; will deprive people of the choice of which equipment to use, and where they can use it; and will result in greater loss of elk, bison and deer. In exchange, only 1% of the winter visitors will benefit from the lower noise level; air pollution, which is concentrated in only a few areas on the highest use days, will be minimally improved; and the effects of water pollution are hypothetical and unknown. How the agency can conclude this is the best alternative is beyond me.

PREFERRED ALTERNATIVE

Instead of Alt. B I prefer Alt. E, modified to 1) eliminate plowing of the road from West Yellowstone to Old Faithful, 2) eliminate busing from West Yellowstone to Old Faithful, 3) keep the Grand Loop open to snowmobiles, including access from all existing entrances; and 4) provide the groomed snowmobile routes currently available in GTNP.

That concludes my comments. Thank you for the opportunity to comment on the proposed Winter Plan for Yellowstone and Grand Teton National parks. I urge you to not eliminate an important part of the Yellowstone experience by plowing the road to Old Faithful. This would truly ruin the winter experience for me and my family.

Respectfully,



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Page 1. Re: Opposition to alternative B. Under the CEQ regulations, the requirement in an EIS is to provide a range of reasonable alternatives that clearly define the issues, and to fully evaluate and disclose the possible effects of those alternatives. The DEIS meets this requirement, while acknowledging that the commenter disagrees about many of the impacts disclosed. In general, the expressions of opposition relate to the decision that the commenter would like to see NPS make, based on myriad disagreements about the effects disclosed in the DEIS. The general response to such comments is that the commenter's opinions will be considered in making the final decision, but that there is nothing in those opinions that substantively would alter the range of alternative features to be evaluated in the Final EIS. For example, if the features that are not supported were to be deleted from the range of alternatives then the analysis would be left only with features that the commenter likes or agrees with. If only the actions that are liked by the commenter remain, then there is effectively only one alternative. Therefore, expressions of support or objection will not be responded to, in general, by changes in alternative features – they will be responded to when the decision criteria are developed, and accordingly, when the rationale for the decision is presented in the Record of Decision. People who commented in this fashion are asked to consider that there is a very clear separation between alternatives legitimately considered in an analysis and the expression of a preferred alternative or the decision to be made.

Page 1. Re: Personal freedom of access. Please see the purpose and need section in the DEIS and the FEIS. Personal access may be reflected in the statements of desired condition, but personal access by snowmobile is not a right or a guarantee. The NPS mandate, as stated in the purpose and need section, places personal enjoyment and freedom of access in a subordinate role to protection of park values so they are unimpaired for future generations. All alternatives but one in the EIS allow the use of snowmobiles in varying degrees and places, depending upon the alternative concept. The impact of each alternative on visitor experience is disclosed, including impacts on snowmobile users as a group. The difficulty is that personal access via snowmobile, considering present commercial technology and usage, causes a variety of impacts on park resources, values and other visitors.

Page 1. Re: Grand Loop experience. Several alternatives (A, D, and E) propose maintaining the sections of road known as the Grand Loop for snowmobile use. Other alternatives propose that road plowing or closures occur on sections of the Grand Loop. The effects of road plowing and closures on visitor experience proposed in these alternatives are disclosed in Chapter IV of the DEIS. Please see response to this letter in regard to page 1 "Oppositions to alternative B."

Page 1. Re: Economies of local communities. Please see response to this letter in regard to page 1 "Oppositions to alternative B."

Your comment is correct in that the NPS cannot arbitrarily eliminate snowmobile use in the parks. However, basing a decision as you suggest, on the fact that local communities rely on snowmobiling for economic viability without an examination of other alternatives and their effects on park resources would certainly be arbitrary. The NPS is involved in a lengthy and detailed process that is designed to ensure that arbitrary decisions are not made. The NEPA process is intended to help public officials make decisions that are based on understanding of environmental consequences and take actions that protect, enhance and restore the environment (§1500.1).

Page 1-2. Re: Support of Revised Alternative E. The alternative feature suggested in this comment are all components of alternative E as presented in the DEIS pages 34-35.

Page 2. Re: Omission of socioeconomic issue. The commenter is referred to pages 13 and 14 where social and economic topics are identified as major issues and to the corresponding discussions presented in Chapters III and IV.

Page 2. Re: Formulation of alternatives. In October of 1998 representatives from the 3 states and 5 counties that are designated as cooperating agencies met in Idaho Falls, ID to share their ideas for alternatives to be presented in the Winter Use DEIS. (Please see Volume II Appendix A for a complete list of ideas generated at that workshop). A review of the ideas generated at that workshop indicate that maintaining or adding opportunities for winter recreation while protecting the park's natural resources were most important to the cooperating agencies. Alternatives A, C, D and E reflect these concerns. The overwhelming support for Revised Alternative E indicates that at least one alternative was proposed in the DEIS that, with a few minor modifications, would meet the needs and interests of the cooperating agencies. This alternative will remain in the range of options the decision-maker may consider when making his or her decision. As an aside, the final selected alternative may mix features from the range of alternatives evaluated in the final EIS. Such mixing can occur as long as the

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features are consistent with one another, and as long as the effects of such an alternative would not fall outside the range of effects disclosed in the EIS.
Page 2. Effects of alternative B. This comment restates the disclosure of effects present in the DEIS. Readers should understand that it is the purpose of an EIS to disclose the possible effects of a proposed action and alternatives to it.
Page 2. These comments restate the disclosure of effects present in the DEIS. It should be noted that many interested parties commented during scoping and during the DEIS review that snowmobiles produce unwanted noise, air pollution and water pollution. The impacts of human winter use activities on the natural soundscape, air quality and water quality will be enhanced in the FEIS.